12.10 Pesticide Pit, Yakima, Washington (10WA012)
Renamed: Pesticide Lab, Yakima, Washington

12.10.1 List of Commentors

NPL-285 R. W. Moore, Director, Department of Ecology, State of Washington. 2/24/83.

NPL-F1 H. C. Cox, Regional Administrator, Agricultural Research, Western Division, USDA. 2/17/83.

NPL-L16 B. Blanchard, Director, Environmental Project Review, U.S. Department of Interior. 3/17/83.

12.10.2 Summary of Comments and Response

The State of Washington noted that the Agricultural Research Laboratory is a Federal facility and cannot be placed on the NPL. This site is on leased land and, therefore, is appropriately included on the NPL.

The USDA commentor noted that the aquifer appears to be deeper than 21 feet. In response, the HRS scoring instructions define the depth to the aquifer of concern as the vertical measure from the lowest point of the hazardous substance to the highest seasonal level of the saturated zone of the aquifer. The value of 3 was assigned for an estimated distance of 14 to 19 feet between these two levels.

The USDA commentor noted that no DDT has been used at the site since 1967 and that the score of 18 for toxicity/persistence is too high. The Agency agrees that DDT should not be used in assigning a value. A number of other pesticides, however, are used at the site, and lindane, specifically, warrants a value of 18 for toxicity/persistence.

The USDA commentor disputed the ground water targets scoring. The values are considered appropriate given the fact that a backup well serving the entire population of Yakima lies within the 3 mile radius.

With respect to the surface water route, the USDA commentor noted that the drain field score should be reduced to 0 or 1 and that the score of 2 for distance to surface water is not appropriate since the contents of the drain field do not reach any surface streams.

The value of 2 for distance to nearest surface water is correctly based on a distance of 2000 feet. Determining a value for containment under the surface water route is difficult since the HRS does not directly address subsurface septic tanks with drainfields. The drainfield is just below the surface and has no runoff diversion system and no surface runoff collection system should there be any overflow. The Agency believes that this rating factor is best assigned a value of 2 to reflect the situation in comparison to the HRS instructions for scoring surface impoundments and landfills.

During the Agency review of the documentation for this site, the surface water population served/distance to water intake rating factor was changed. The population served remains 101-1000 (747 persons) but the distance, originally thought to be 8000 feet, has been documented at 1950 feet. The rating factor value has been changed from 12 to 20 accordingly.

The State of Washington expressed concern that pesticides and agricultural chemicals may be migrating into the aquifer and the U.S. Department of the Interior noted a fish kill that effects Indian fisheries and highlighted ground water pollution as a potential problem. The total site score reflects these comments.

The original migration score for this facility was 33.50. Based on the changes noted above, the HRS scores for Pesticide Pit, Yakima are:

Ground Water	48.12
Surface Water	10.75
Air	0
Total	28.50